

Comment on: Media Ownership Policy Reexamination
Proceeding: 02-277
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In creating new media ownership rules, the FCC must promote diversity. Diversity cannot be achieved by market based solutions. The market chases money and focusses on efficiency. The most efficient way to make money in any business is to minimize diversity, finding the minimum product mix which appeals to the largest number of people. In a media business, this results in a consolidated, homogeneous dumbed-down media with all media sources fighting over a few big markets. This has been demonstrated in California where the consolidation of media has resulted in local content being cut, low quality news and journalism, and special interests (i.e. ethnicity) not being represented. The radio waves are now programmed with mainstream, commercial laden content from some corporate headquarters on the other side of the country. Public radio (NPR) and television (PBS) are the only worthwhile media, and the only one responding to local needs.

If the FCC does not create rules to prevent consolidation and promote diversity, these ongoing and disturbing trends will dominate:

- Elimination of diversity in favor of mainstream market
- Reduction of local content (the only local content will be advertisements)
- Squelching of local voice & talent
- Low quality news, no investigative journalism, corporate sponsored news.
- Increase of junk radio and TV (reality TV, shock factor programming)
- Increasing usage of media for "product placement", i.e. intermixing of advertising and "real" content.
- The control of public opinion by a few government sponsored corporations

Achieving media diversity will require explicit restrictions on:

- Ownership of media by a single company in a region: A single company should not be allowed to control more than a designated percentage of media in any single area (limit should be 25% or less)
- Ownership of different types of media: A single company should not be allowed to control multiple media outlets, i.e. radio, TV, newspaper.
- Ownership of the delivery mechanism and the content: A company should not be allowed to control both the mechanism for distribution (i.e. cable, airwaves, phone lines, ...) and the media content.

Please avoid the temptation to give in to the pressures of the corporate media giants. Produce some rules which will set a positive direction for the future evolution of the U.S. media.

Thank you.
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